

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Lynchburg Division**

WALTER SCOTT LAMB,

Plaintiff,

v.

LIBERTY UNIVERSITY, INC.,

Defendant.

)
)
)
)
)
)
)
)
)
)

Civil Action No. 6:21-cv-55

DEFENDANT’S MOTION TO DISMISS THE COMPLAINT

Defendant Liberty University, Inc., by counsel and pursuant to Fed. R. Civ. P. 12(b)(6), respectfully requests that the Court dismiss Scott Lamb’s Complaint (ECF No. 1) with prejudice, for the reasons set forth in the accompanying Memorandum of Law.

Respectfully submitted,

LIBERTY UNIVERSITY, INC.
BY COUNSEL:

/s/ Scott C. Oostdyk

Scott C. Oostdyk (VSB No. 28512)
Heidi E. Siegmund (VSB No. 89569)
MCGUIREWOODS LLP
Gateway Plaza
800 East Canal Street
Richmond, VA 23219
(804) 775-1000
(804) 775-1061 (facsimile)
soostdyk@mcguirewoods.com
hsiegmund@mcguirewoods.com

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of November, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send a true and correct copy to all counsel of record.

/s/
Heidi E. Siegmund (VSB No. 89569)
MCGUIREWOODS LLP
Gateway Plaza
800 East Canal Street
Richmond, VA 23219
(804) 775-1000
(804) 775-1061 (facsimile)
hsiegmund@mcguirewoods.com

Counsel for Defendant